

In The United States District Court
For The District of Delaware

James L. Lewis
plaintiff
v

Lt Cheryl Morris, Dir
Chris Klee administrative
Michael Knight and all officers
and supervisors of the prison
systems in State of Delaware
(to be named later, now known
as John Does) who violated
Constitutional rights mentioned

Motion For
Appointment of
Counsel
Civil Action No.

06-236-SLR



Pursuant to 28 USC § 1915(e)(1) plaintiff
(or plaintiffs) moves for an order appointing
counsel to represent him in this case. In
support of this motion plaintiff states:

1. Plaintiff is unable to afford counsel. He has
requested leave to proceed in forma pauperis and was
granted.

2. Plaintiff's imprisonment will/has greatly
limited his ability to ~~lit~~ litigate. The issues of this
case are complex, and will require significant
research and investigation. Plaintiff has limited access
to the law library and limited knowledge of the law.

3. A trial in this case likely will involve

conflicting testimony, and Counsel would better enable plaintiff to present evidence and cross examine witnesses.

4. Plaintiff's inability to get State documents involved in this case and to obtain documents showing inmate assignments and work schedules done by other inmates are impossible for him and would dictate subpoenas done by an attorney.

5. Plaintiff's inability to talk to other inmates who have come forward to back up plaintiff's complaints and allegations. And ability to question guards has has already been shown in a disciplinary hearing plaintiff was already denied access to witnesses against the state.

Wherefore, plaintiff request that the court appoint a member of the bar as counsel to represent plaintiff in the case.

6/27/2006

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